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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Case No. 3:11-cv-2509-LHK

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14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS
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**DECLARATION OF JUSTINA K.
SESSIONS IN SUPPORT OF
DEFENDANTS' JOINT RENEWED
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE EXPERT REPORTS
OF DR. LEAMER AND DR. MURPHY**

1 I, JUSTINA K. SESSIONS, declare and say that:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate with the law firm of Keker & Van Nest LLP, located at 633 Battery Street, San
4 Francisco, California 94111, counsel for Defendant Lucasfilm Ltd. ("Lucasfilm") in the above-
5 captioned action. I am duly admitted to practice law before this Court. I have knowledge of the
6 facts set forth in this declaration, and if called to testify as a witness thereto could do so
7 competently under oath.

8 2. For the reasons outlined below, and the reasons provided in the Declaration of
9 David J. Anderman in Support of Defendants' Joint Response to Plaintiffs' Administrative
10 Motion to Seal [Dkt. No. 199], Lucasfilm seeks to maintain under seal certain portions of the
11 Expert Report of Edward E. Leamer, Ph.D. ("Leamer Report") (Dkt. 190) and portions of the
12 Expert Report of Professor Kevin M. Murphy ("Murphy Report") (Dkt. 230). The portions
13 Lucasfilm seeks to maintain under seal contain or reflect Lucasfilm's confidential business
14 practices and/or confidential compensation or recruiting data.

15 3. Certain portions of the Leamer Report contain or reflect materials that Lucasfilm
16 designated Confidential or Confidential-Attorneys' Eyes Only under the Protective Order in this
17 action [Dkt. No. 107] and should be maintained under seal.

18 i) Lucasfilm seeks to maintain under seal the portions of Figure 3 and Figure
19 4 (p. 23) that describe the number of class members and total class compensation for Lucasfilm
20 during the alleged agreement period. These materials reflect Lucasfilm's confidential
21 compensation data. Lucasfilm strictly maintains the confidentiality of its actual compensation
22 numbers. Lucasfilm could be competitively harmed if other companies gained access to this
23 information because, among other things, it would enable competitors to determine Lucasfilm's
24 pay practices. Other companies could adjust their own compensation practices based on their
25 knowledge of Lucasfilm's compensation methods and levels.

26 4. Certain portions of the Murphy Report reflect materials that Lucasfilm designated
27 Confidential or Confidential-Attorneys' Eyes Only under the Protective Order in this action [Dkt.
28 No. 107] and should be maintained under seal.

i) Lucasfilm seeks to maintain under seal the Lucasfilm-specific portions of Murphy Report Exhibits 2A, 2B, and 5. These materials reflect Lucasfilm's employment numbers, which are not publicly available. Lucasfilm could be competitively harmed if other companies gained access to this information because, among other things, it would enable a competitor to extrapolate or estimate Lucasfilm's compensation budgets and compensation practices.

ii) Lucasfilm also seeks to maintain under seal the Lucasfilm-specific portions of Murphy Report Exhibits 8A, 8B, 10, and 19 and Appendices 3A-4D, 5D, and 6D. These materials reflect Lucasfilm's confidential compensation data. Lucasfilm strictly maintains the confidentiality of its actual compensation numbers. Lucasfilm could be competitively harmed if other companies gained access to this information because, among other things, it would enable competitors to determine Lucasfilm's pay practices.

5. Because Lucasfilm has sought to maintain the confidentiality of the materials described above, and because public disclosure of these materials could cause Lucasfilm significant harm, the portions of the documents described above should be redacted and shielded from disclosure to Lucasfilm's potential competitors.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed in San Francisco, California, on April 12, 2013.

/s/ Justina K. Sessions
JUSTINA K. SESSIONS